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May 23, 2023

VIA ECF

Honorable Nicholas G. Garaufis
United States District Court Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Carlton Roman v. City of New York, et al.
22-cv-6681 (NGG) (CLP)

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney representing defendants City of New York, William Pepey, John Loguercio, Gerard Fiorenza, Leonard Palermo, Patrick O'Brian, Dennis Byrne, Catharine Lomuscio, Richard Schaeffer, Robert Masters, and Francesco Catarisano (collectively, the "defendants") in this action. Defendants respectfully submit this letter requesting an increase in the page limit for defendants' memoranda of law in support of their motion to dismiss the Third Amended Complaint pursuant Fed. R. Civ. P. 12(b)(6).

Per Your Honor's individual rules, memoranda of law in support of a motion to dismiss must be limited to twenty-five double-spaced pages. I am writing to request a 15 page increase for Defendants' Memorandum of Law. Defendants' respectfully submit that an increase in the page limit is necessary to allow defendants to fully argue and cite authority as to why Plaintiff's claims must be dismissed.

As Your Honor is aware, this is a complex case. Plaintiff's Third Amended Complaint is 159 pages in length, contains 658 paragraphs, and alleges thirteen separate claims. Defendants are making every effort to put forth their positions in a succinct fashion, but feel that the additional 15 pages are necessary to adequately address the numerous claims alleged in plaintiff's Third Amended Complaint.

I thank the Court for its time and consideration of this request.

Respectfully submitted,

/s/ Seema Kassab

Seema Kassab

Assistant Corporation Counsel

cc: All Counsel (By E.C.F.)